

Facility Name: **Chattahoochee Energy Facility**

City: Franklin

County: Heard

AIRS #: 04-13-149-00006

Application #: 23844

Date SIP Application Received: May 27, 2016

Date Title V Application Received: NA

Permit No: 4911-149-0006-V-04-1

Program	Review Engineers	Review Managers
SSPP	Steve Allison	James Eason
Permitting Program Manager		Eric Cornwell

## Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

**I. Facility Description****A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
4911-149-0006-V-04-0	7/31/2012	Title V Renewal.

**B. Regulatory Status****1. PSD/NSR/RACT**

This Title I site is comprised of three separately permitted facilities; the Wansley Steam-Electric Generating Plant (AFS No. 149-00001), the Chattahoochee Energy Facility (AFS No. 149-00006), and the Municipal Electric Authority of Georgia-Wansley Unit 9 (AFS No. 149-00007). The Title I site is a major source under the PSD/NSR regulations because potential emissions of NO<sub>x</sub> exceed 100 tons per year. Note: The Title I site is classified as one of the 28 named source categories under PSD – *Fossil-fuel boilers (or combination thereof) totaling more than 250 MMBtu per hour heat input.*

**2. Title V Major Source Status by Pollutant****Table 2: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	Y	✓		
PM <sub>10</sub>	Y	✓		
PM <sub>2.5</sub>	Y	✓		
SO <sub>2</sub>	Y	✓		
VOC	Y	✓		
NO <sub>x</sub>	Y	✓		
CO	Y	✓		
TRS	Y			✓
H <sub>2</sub> S	Y			✓
Individual HAP	Y	✓		
Total HAPs	Y	✓		

**II. Proposed Modification****A. Description of Modification**

This significant Modification without Construction Application (No. TV-23844) was received on May 27, 2016. This application is requesting the renewal of the facility's Acid Rain Permit for calendar years 2017 through 2021

**B. Emissions Change**

There will be no change in potential or actual emissions associated with this permit modification.

**Table 3: Emissions Change Due to Modification**

<b>Pollutant</b>	<b>Is the Pollutant Emitted?</b>	<b>Net Actual Emissions Increase (Decrease) (tpy)</b>	<b>Net Potential Emissions Increase (Decrease) (tpy)</b>
PM	Y	0	0
PM <sub>10</sub>	Y	0	0
PM <sub>2.5</sub>	Y	0	0
SO <sub>2</sub>	Y	0	0
VOC	Y	0	0
NO <sub>x</sub>	Y	0	0
CO	Y	0	0
TRS	Y	0	0
H <sub>2</sub> S	Y	0	0
Individual HAP	Y	0	0
Total HAPs	Y	0	0

**C. PSD/NSR Applicability**

This modification does not include physical changes or changes in the method of operation of the facility. Therefore, PSD/NSR is not applicable.

**III. Facility Wide Requirements**

This subsection is not applicable for this modification.

**IV. Regulated Equipment Requirements**

This subsection is not applicable for this modification.

**V. Testing Requirements (with Associated Record Keeping and Reporting)**

This subsection is not applicable for this modification.

**VI. Monitoring Requirements (with Associated Record Keeping and Reporting)**

This subsection is not applicable for this modification.

**VII. Other Record Keeping and Reporting Requirements**

This subsection is not applicable for this modification.

**VIII. Specific Requirements**

**A. Operational Flexibility**

There are no requests for operational flexibility associated with this modification.

**B. Alternative Requirements**

There are no alternative requirements associated with this modification.

**C. Insignificant Activities**

There are no insignificant activities associated with this modification.

**D. Temporary Sources**

There are no temporary sources associated with this modification.

**E. Short-Term Activities**

There are no short-term activities associated with this modification.

**F. Compliance Schedule/Progress Reports**

The facility is operating in compliance with all applicable air quality rules and regulations.

**G. Emissions Trading**

There are no emissions trading associated with this modification.

**H. Acid Rain Requirements/CAIR/CSPAR**

There have been no changes at the Chattahoochee Energy Facility that would affect the Acid Rain Permit. This renewal is being pursued solely because the current permit is expiring.

I. Prevention of Accidental Releases

This permit modification does not affect the applicability of Prevention of Accidental Releases requirements to this facility.

J. Stratospheric Ozone Protection Requirements

This permit modification does not affect the applicability of Stratospheric Ozone Protection requirements to this facility.

K. Pollution Prevention

This permit modification does not affect the applicability of Pollution Prevention requirements to this facility.

L. Specific Conditions

There are no specific conditions associated with this permit modification.